

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK STEPHEN PURSLEY,

Defendant.

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Case 4:18-cr-00575

DEFENDANT’S NOTICE OF EXPERT WITNESS

PLEASE TAKE NOTICE, The Defendant, Jack Stephen Pursley, hereby gives his notice of expert witnesses, pursuant to Fed. R. Crim. Pro. 16(b).

1. **Ron Braver.** Mr. Braver is a C.P.A. and former Special Agent. The Court will find attached as exhibit “1” copy of Mr. Braver’s curriculum vitae.
 - a. At trial, Pursley anticipates that Mr. Braver will testify as a rebuttal summary witness and about tax procedures.
2. **Janet McHard.** Ms. McHard is a C.P.A. and private investigator. The Court will find attached as exhibit “2” a copy of Ms. McHard’s curriculum vitae.
 - a. At trial, Pursley anticipates that Ms. McHard will testify as rebuttal, about CPA ethics and about tax computations.
3. **Stephen Grace., Ph.D.** Mr. Grace holds a Ph.D. in economics from the University of Houston. The Court will find attached as exhibit “3” a copy of Mr. Grace’s curriculum vitae.
 - a. At trial, Pursley anticipates Mr. Grace to testify as rebuttal and about common business practices, real estate transactions and stock transactions specifically

related to this case.

Respectfully submitted on November 16, 2018

MINNS & ARNETT

s/ Ashley Blair Arnett

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Attorneys for Jack Stephen Pursley

CERTIFICATE OF SERVICE

This is to certify that on this the 16th day of November 2018, a true and correct copy of the above and foregoing instrument was served upon all counsel of record.

/s/ Ashley Blair Arnett

Ashley Blair Arnett